Statement of the Department of the Interior Regarding Narrative Salmon Protection Objective SWRCB Workshop - Water Quality Control Plan Periodic Review October 2004

As Federal agencies charged with responsibilities to protect, restore and recover fisheries resources, this statement is being made, in part, as a follow up to the Dec. 5, 2001, Public Workshop regarding progress towards meeting the Narrative Salmon Protection Objective of the 1995 Bay-Delta Water Quality Control Plan (WQCP). Because accomplishment of this objective will ultimately entail a watershed or basin-wide approach, efforts in both the Delta and the streams above the Delta must be actively coordinated in such a way that these multi-agency efforts are both effective and consistent with the ongoing recovery process of ESA listed winter-run Chinook salmon, spring-run Chinook salmon and Central Valley steelhead. We recommend the Salmon Protection Objective be addressed through an interactive and collaborative process between and state and federal agencies (including the SWRCB) responsible for these public trust resources. With regard to SWRCB actions, this process should include the identification of general and/or specific actions the SWRCB could undertake to aid in achieving the doubling of all four runs of Chinook salmon while taking into account the recovery needs of Central Valley steelhead. It is important to recognize that there may be potential conflicts in operations for meeting goals between management actions for salmon doubling in the Delta and management actions for salmon doubling in the upstream environments. These potential conflicts exist due to the inherent uncertainty associated with water resources. Actions to manage those resources may have different effects on management goals in the upstream environment and in the Delta environment and those conflicts will need to resolved. The resolution of those conflicts will require that they be considered and coordinated in a flexible manner by all of the agencies involved including the SWRCB.

Our recommended general actions for the Salmon Doubling Objective are:

- FWS has addressed the goal of doubling production of Chinook salmon in the Final Anadromous Fish Restoration Program (AFRP) Plan, January 2001; this may be considered as a baseline in determining accomplishments in meeting this objective;
- II) Include in any actions that the SWRCB undertakes consideration of the specific protection needs of Central Valley steelhead, a federally listed species under ESA jurisdiction;
- III) Coordinate with state and federal agencies when either Delta or upstream actions, including determination of flow and water quality objectives to address Chinook salmon doubling, are undertaken by SWRCB regarding the WQCP so that such actions meet overall goals and do not conflict with each other;
- IV) Consider in any other actions that come before the SWRCB the overall goal of doubling of Chinook salmon; and
- V) Provide the coordination and assistance required to improve water quality and biological monitoring and mitigation for anadromous fish populations in the Sacramento-San Joaquin and Bay-Delta watershed.

